



FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

November 20, 2014

Julie Hamos
Director
Illinois Department of Healthcare and Family Services
401 S. Clinton Street
Chicago, IL 60607

Dear Director Hamos,

On behalf of the Illinois State Alliance of YMCAs, I respectfully submit comments on *The Path to Transformation: Concept Paper for an 1115 Waiver for Illinois Medicaid*. The Illinois State Alliance of YMCAs brings together 108 YMCA locations working in 120 communities and engaging more than 548,000 members in Illinois to strengthen the foundations of community through youth development, health living and social responsibility. Illinois Ys are committed to forwarding wellness and prevention strategies that offer support to individuals and families in the community through non-clinical interventions.

The Alliance appreciates the work done by you and your staff to develop this concept paper that draws on the Alliance for Health work. We look forward to continued and ongoing opportunities to give input and provide feedback during the development of the waiver request and the CMS State Innovations Model implementation grant.

We are excited to see the inclusion of population health management as one of the four pathways identified in the concept paper. Ys across the state provide healthy living and prevention services that promote health and improve health outcomes for individuals and families. We appreciate that you have adopted a proactive view of health that includes wellness and prevention programs that address health concerns before and as they arise rather than waiting until there are serious medical impacts resulting from chronic conditions.

One such program that we would like to see specifically included in the waiver application is the YMCA's Diabetes Prevention Program. This evidenced-based program helps adults at high risk of developing type 2 diabetes reduce their risk of acquiring the disease by taking steps that will improve their overall health and well-being. Research by the National Institutes of Health has shown that programs like the YMCA's Diabetes Prevention Program can reduce the number of new cases of type 2 diabetes by 58%, and 71% in adults over the age of 60. The program offers 16 weekly sessions followed by monthly sessions for a year in a supportive small group environment where individuals can learn about healthier eating and increasing physical activity as a way to reduce risk. The goal for individuals is to reduce body weight by 7% and increase physical activity to 150 minutes per week. When studies were done, this intervention was found to be more cost effective than many drugs.

In addition, we encourage the following clarifications and areas to be addressed in the future waiver application:

1. Community-based interventions many times can be provided by non-clinical staff through robust evidenced-based programs that have shown significant impact. Therefore, we would encourage the inclusion of specific language in the waiver application that states that non-clinical staff will be able to implement proven community-based programs, not just doctors, nurses and other licensed medical practitioners. We would encourage the Department of Healthcare and Family Services to support more broadly through the waiver application, prevention services offered by non-traditional providers, not just health care providers.
2. We would ask that you specify that performance-based contracting can be an option for community-based programs as it can ensure that Medicaid dollars are making a real impact on the health of individuals.

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3. Since community-based interventions can contribute to significant cost savings to the health care system, we would suggest that primary prevention programs and those entities implementing them be able to share in the rewards of any cost savings incentive structure created.
4. The Alliance supports the expansion of a broad range of obesity prevention programs through addressing current limitations in Medicaid reimbursement for these services. We encourage you to include in the waiver application an expansion of coverage and opportunities for children to access obesity prevention services. This would include allowing payment to other more appropriate (and potentially less costly) providers for pediatric weight management services, such as dietitians, psychologists, social workers and nutritionists, increased allowable reimbursable visits for pediatric weight management, flexibility in the number of visits for children showing slower progress in weight management and coverage for existing intensive weight-management programs serving children. Also, as we stated above, we support the use of non-clinical, non-licensed providers of obesity prevention services where possible in evidenced-based programs.

The Alliance and our members look forward to working with the Department of Healthcare and Family Services to expand access to wellness and prevention services for individuals and families across the state. If you have any questions about our comments, you can reach Meg Cooch, Executive Director, at 773-558-5136 or meg.cooch@illinoisymcas.org.

Sincerely,



Andy Thornton
Chair
Illinois State Alliance of YMCAs



Meg Cooch
Executive Director
Illinois State Alliance of YMCA